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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROHAN SANDEEP RANE, ET AL.,  
COLLIN JOHN THOMAS WALKER,

Defendant.

No. CR 25-40-HDV

[PROPOSED] PROTECTIVE ORDER  
REGARDING PRIVACY OF CHILD VICTIM  
INFORMATION AND PERSONALLY  
IDENTIFYING INFORMATION

The Court having considered the stipulation of the parties filed on February 26, 2025, with respect to the disclosure of information in discovery in this matter and good cause appearing, the Court hereby ORDERS as follows:

1. To permit the government to provide discovery material to defense counsel (hereinafter "Discovery") while avoiding the unauthorized dissemination of child victim/witness information or personally identifying information contained or referenced in the discovery material (hereinafter "PROTECTED MATERIALS"), the Discovery

1 that is produced will be subject to this Protective Order designed to  
2 protect the PROTECTED MATERIALS from inadvertent or unauthorized  
3 disclosure, which disclosure the government believes could violate 18  
4 U.S.C. § 3509(d) or the protections afforded by Fed. R. Crim. P.  
5 16(d).

6 2. The Protective Order will include any Discovery, that is,  
7 written documentation, electronic data, and audio recordings provided  
8 to the Defense Team, as defined below, including any copies of said  
9 Discovery, which include, but are not limited to, paper or electronic  
10 copies before or after the execution of the Protective Order.

11 3. For purposes of this Protective Order, the following terms  
12 are defined:

13 a. "Defense Team" refers to defendant, his counsel of  
14 record, any co-counsel specifically assigned to work on this case,  
15 any defense paralegals, investigators, employees, experts, or  
16 translators hired by the counsel of record for defendant to assist  
17 counsel with this case. "Defense Team" includes any subsequent  
18 counsel of record, should current counsel of record be relieved from  
19 this case. "Defense Team" does not include family members and other  
20 associates of defendant.

21 b. "Personal Identifying Information" ("PII") includes  
22 any information that can be used to identify a person, including  
23 name, address, date of birth, Social Security number, driver's  
24 license number, telephone number, account number, or personal  
25 identification number. The term "PII Protected Information" refers  
26 to materials containing PII that the government produces to the  
27 defense pursuant to the Protective Order.

1 c. "Protected Materials" includes any form of child  
2 victim information or personally identifying information of the  
3 victim, the victim's family, or a cooperating witness. The Protective  
4 Order will include any discovery relating to the PROTECTED MATERIALS,  
5 that is, written documentation, electronic data, photographs and  
6 audio and/or video recordings provided to the Defense Team, as  
7 defined below, including any information contained therein and any  
8 copies of said discovery, which include, but are not limited to,  
9 paper or electronic copies before or after the execution of the  
10 Protective Order.

11 4. Defendant and his attorney are required to give a copy of  
12 this Protective Order to all individuals outside defense counsel's  
13 office engaged or consulted by defense counsel in preparation of the  
14 trial in this case. Said individuals must agree in writing to be  
15 bound by the terms of this Protective Order before receiving any of  
16 the PROTECTED MATERIALS in connection with this case. The Defense  
17 Team will keep a list of all individuals who have agreed in writing  
18 to be bound by the terms of this Protective Order, which list may be  
19 disclosed upon order of the Court in the event that the Court is  
20 asked to determine whether a possible breach of the terms of the  
21 Protective Order has occurred.

22 5. The Defense Team is prohibited from directly or indirectly  
23 providing access to, or otherwise disclosing the contents of,  
24 PROTECTED MATERIALS to anyone not working on the defense of this  
25 criminal case, or otherwise making use of the materials in a manner  
26 unrelated to the defense of this criminal case. For example, family  
27 members and other associates of defendant would not be permitted to  
28

1 receive or review copies of the PROTECTED MATERIALS disclosed by the  
2 government unless such disclosure is carried out pursuant to the  
3 terms of the Protective Order and the parties' stipulation.

4 6. The attorney of record and members of the Defense Team may  
5 display and review the PROTECTED MATERIALS with the defendant. The  
6 attorney of record and members of the defense team acknowledge that  
7 providing copies of the PROTECTED MATERIALS to defendant or other  
8 persons is prohibited, and agree not to duplicate or provide copies  
9 of the PROTECTED MATERIALS to defendant or other persons.

10 7. The Defense Team shall maintain all PROTECTED MATERIALS  
11 received from the government in a manner consistent with the terms of  
12 this Protective Order. PROTECTED MATERIALS produced to the defense  
13 shall be stored by the Defense Team in a secure manner in the defense  
14 team's offices, homes, vehicles, or personal presence. Electronic  
15 materials produced to the defense and printouts obtained from  
16 electronic materials shall be handled in the same manner.

17 8. Any item that references the content of the PROTECTED  
18 MATERIALS that is filed with the Court in connection with pre-trial  
19 motions, trial, sentencing, or other matter before this Court, shall  
20 be filed under seal and shall remain sealed until otherwise ordered  
21 by this Court, pursuant to 18 U.S.C. § 3509(d) and/or Fed. R. Crim.  
22 P. 16(d).

23 9. The Defense Team shall not transfer, disseminate, or send  
24 any of the Discovery produced by the government outside of the United  
25 States, except after complying with the procedures below. The  
26 parties agree that the Discovery will not be transferred,  
27 disseminated, or sent outside the United States by the Defense Team  
28

1 without defendant's counsel of record (1) providing the government  
2 with ten days written advance notice of the Defense Team's intention  
3 to send any Discovery outside the United States and (2) obtaining a  
4 written order from this Court (based upon a regularly-noticed motion)  
5 that specifically authorizes the Defense Team to transfer,  
6 disseminate, or send any of the Discovery outside the United States.  
7 The Defense Team shall use materials designated subject to the  
8 protective order only for the preparation and litigation of this  
9 matter, and for no other purpose. Litigation of this matter includes  
10 any appeal filed by the defendant, and any motion filed by the  
11 defendant pursuant to 28 U.S.C. § 2255. Upon the final disposition  
12 of this case, any materials designated subject to the protective  
13 order shall not be used, in any way, in any other matter, absent a  
14 court order. All materials designated subject to the protective  
15 order maintained in the Defense Team's files shall remain subject to  
16 the protective order unless and until such order is modified by this  
17 Court. Upon the conclusion of appellate and post-conviction  
18 proceedings, and upon the consent of defendant, the Defense Team  
19 shall return the discovery or certify that the discovery has been  
20 destroyed.

21 IT IS SO ORDERED.

22  
23 Dated: \_\_\_\_\_

24 \_\_\_\_\_  
25 THE HONORABLE HERNÁN D. VERA  
UNITED STATES DISTRICT JUDGE

26 Presented by:

27 /s/ Catharine Richmond  
28 CATHARINE A. RICHMOND  
Assistant United States Attorney